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January 30, 2020

**Via Electronic Filing**

Honorable Joel Schneider  
United States Magistrate Judge  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza-4<sup>th</sup> & Cooper Sts.  
Camden, New Jersey 08101

Re: Eric Hines v. Gary Lanigan, et al,  
Civil Action No.: 17-cv-02864 (NLH-JS)

Dear Judge Schneider:

I represent Defendants in the above-entitled action. I respectfully request a 60-day extension of the factual discovery deadline to May 1, 2020, and an extension of the deadline for dispositive motion to June 15, 2020.

On November 6, 2019, the Court issued a scheduling order, which made factual discovery due by January 31, 2020, and dispositive motions due by March 2, 2020. Prior to that date, the Court granted a motion for Plaintiff's attorney to be relieved as counsel. After issuing the order granting the motion to be relieved as counsel, the Court ordered that all current scheduling deadlines remain in effect.

I request an extension for discovery and dispositive motions because Plaintiff's former attorney did not respond to outstanding discovery and there is no indication that he forwarded discovery documents to the client. As a result, paper discovery remain outstanding. Defendants would like to have the benefit of Plaintiff's responses to interrogatories and document requests



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before conducting a deposition. Additional time is also needed for the Department of Corrections to respond to Defendants' request for documents from Plaintiff's classification and medical files that are responsive to allegations in the complaint. It should also be noted that on January 7, 2020, Plaintiff, pro se, filed a motion to amend the complaint, which is set for February 3, 2020.

Due to Plaintiff's incarceration at South Woods State Prison, I was not able to obtain his response to this request. I thank the Court for its consideration.

Respectfully requested,

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY

By: s/ Marvin L. Freeman  
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Deputy Attorney General

c: **Via Regular Mail**  
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